

EXHIBIT 80

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF VIRGINIA
4 ALEXANDRIA DIVISION

5 -----X
6 UNITED STATES, et al.,

7 PLAINTIFF,

8 -against-

9 Case No.:

10 1:23-CV-00108-LMB-JFA

11 GOOGLE, LLC,

12 DEFENDANT.

13 -----X

14 DATE: September 20, 2023

15 TIME: 9:30 A.M.

16 VIDEOTAPED DEPOSITION of LARA STOTT,
17 taken by the Defendant, pursuant to a Court
18 Order, held via videoconference, before
19 Rivka Trop, a Notary Public of the State of
20 New York.

21
22
23
24
25 Job No. CS6097892

<p style="text-align: right;">Page 2</p> <p>1 2 A P P E A R A N C E S: 3 4 UNITED STATES DEPARTMENT OF JUSTICE Attorneys for the Plaintiff 5 UNITED STATES, ET AL 450 Fifth Street, N.W. 6 Washington, D.C. 20530 BY: KATHERINE CLEMONS, ESQ. 7 -and- 8 RACHEL ZWOLINSKI, ESQ. 9 -and- 10 ALVIN CHU, ESQ. 11 12 PAUL, WEISS, RIFKIND, WHARTON & GARRISON, LLP Attorneys for the Defendant 13 GOOGLE, LLC 2001 K Street, N.W. 14 Washington, D.C. 20006 BY: HEATHER MILLIGAN, ESQ. 15 -and- 16 MARTHA L. GOODMAN, ESQ. 17 18 ALSO PRESENT: ORSON BRAITHWAITE, Videographer 19 20 CAPTAIN MICHAEL ELLIS 21 * * * 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 L. STOTT 2 record. 3 MS. MILLIGAN: Heather Milligan 4 from Paul, Weiss, Rifkind, Wharton & 5 Garrison on behalf of Google. With me 6 is my colleague, Martha Goodman. 7 MS. CLEMONS: This is Katherine 8 Clemons, with the Department of 9 Justice, on behalf of the United States 10 and the witness. 11 MS. ZWOLINSKI: Rachel Zwolinski, 12 on behalf of the United States. 13 MR. CHU: Alvin Chu, on behalf of 14 the United States. 15 MR. ELLIS: Captain Michael Ellis, 16 Air Force Recruiting Service. 17 THE VIDEOGRAPHER: Will the court 18 reporter, please, swear in the witness. 19 L A R A S T O T T, called as a witness, 20 having been first duly sworn by a Notary 21 Public of the State of New York, was 22 examined and testified as follows: 23 EXAMINATION BY 24 MS. MILLIGAN: 25 Q. Please state your name for the</p>
<p style="text-align: right;">Page 3</p> <p>1 L. STOTT 2 THE VIDEOGRAPHER: Good morning we 3 are going on the record at 9:39 a.m., 4 on September 20, 2023. Please note 5 that the microphones are sensitive and 6 may pick up whispering, private 7 conversations, please mute your phones 8 at this time. Audio and video 9 recording will continue to take place 10 unless all parties agree to go off the 11 record. 12 This is media unit 1 of the 13 deposition Ms. Lara Stott in the matter 14 of United States et al. versus Google, 15 LLC, founded in the United States 16 District Court, Eastern District of 17 Virginia, Alexandria Division, Case No. 18 1:23-CV-00108-LMB-JFA. 19 My name is Orson Braithwaite from 20 Veritext Legal Solutions, and I am the 21 videographer. 22 The court reporter is Rivka Trop 23 from the firm Veritext Legal Solutions. 24 Counsel will now state their 25 appearances and affiliated for the</p>	<p style="text-align: right;">Page 5</p> <p>1 L. STOTT 2 record. 3 A. Lara Stott. 4 Q. Good morning, Ms. Stott. We met 5 the other day. 6 Just for the record, my name is 7 Heather Milligan, and I represent Google. 8 You are the senior strategic adviser for 9 marketing to the commander at Air Force 10 Recruiting Service, is that right? 11 A. Yes. 12 Q. Do you understand that you are 13 testifying today as a corporate 14 representative of the Air Force? 15 A. I do. 16 Q. In preparing for your testimony 17 today, did you review the overarching 18 contract between the Air Force and GSD&M? 19 A. Yes, I did. 20 MS. MILLIGAN: Can we go off the 21 record for just a minute. 22 THE VIDEOGRAPHER: The time is 23 9:41 a.m. We are off the record. 24 (Whereupon, an off-the-record 25 discussion was held.)</p>

<p style="text-align: right;">Page 38</p> <p>1 L. STOTT</p> <p>2 MS. CLEMONS: Objection to form.</p> <p>3 A. AIRS are saved and filed by each</p> <p>4 one of the CORs. They all have different</p> <p>5 folders that they save those for each</p> <p>6 contract.</p> <p>7 Q. Are those folders in a centralized</p> <p>8 location or in the CORs own files?</p> <p>9 A. No, it is on the shared drive,</p> <p>10 centralized location.</p> <p>11 Q. How are they numbered?</p> <p>12 MS. CLEMONS: Objection to form.</p> <p>13 A. I would have to reference the</p> <p>14 actual AIR procedures, which I don't have in</p> <p>15 front of me right now. But there is an</p> <p>16 actual procedure of how they are supposed to</p> <p>17 number the AIR.</p> <p>18 Q. Is Air Force seeking to recover</p> <p>19 any amount in this lawsuit for the Google</p> <p>20 programmatic display expenses reflected on</p> <p>21 the invoice?</p> <p>22 MS. CLEMONS: Objection to form.</p> <p>23 A. Again, the recruitment service</p> <p>24 marketing team has not been involved in</p> <p>25 determining what damages are being sought.</p>	<p style="text-align: right;">Page 40</p> <p>1 L. STOTT</p> <p>2 representative within RSM, Recruitment</p> <p>3 Service Marketing, and he directly reports</p> <p>4 to Maj. Lane.</p> <p>5 Q. Can you turn to the page ending in</p> <p>6 771759 underscore 0010. Actually, if you</p> <p>7 look at the page right before that ending in</p> <p>8 0009, do you see at the last header on that</p> <p>9 page is Google Programmatic and all right,</p> <p>10 and then below that there are line items</p> <p>11 from 2022 going through part of 2023?</p> <p>12 A. Yes, we are going onto the next</p> <p>13 page?</p> <p>14 Q. Yes.</p> <p>15 And so when Air Force purchases</p> <p>16 Google programmatic audio, what is it</p> <p>17 purchasing?</p> <p>18 MS. CLEMONS: Objection to form.</p> <p>19 A. I would actually need to see the</p> <p>20 corresponding media plan that goes with this</p> <p>21 to answer that question.</p> <p>22 Q. Do you know what Air Force is</p> <p>23 purchasing when it purchases Google</p> <p>24 programmatic display?</p> <p>25 A. Again, I would want to actually</p>
<p style="text-align: right;">Page 39</p> <p>1 L. STOTT</p> <p>2 Q. But you understand that you are</p> <p>3 here testifying not as a representative of</p> <p>4 the Air Force Recruiting Service, but</p> <p>5 actually as a representative of the Air</p> <p>6 Force?</p> <p>7 A. I do.</p> <p>8 Q. So is anyone at the Air Force</p> <p>9 involved in determining the damages that Air</p> <p>10 Force is seeking?</p> <p>11 A. I don't know.</p> <p>12 MS. MILLIGAN: Marking as</p> <p>13 Exhibit 130, USAF-ADS-000077-1759.</p> <p>14 (Whereupon, a document bearing</p> <p>15 Bates USAF-ADS-000077-1759 was marked</p> <p>16 Stott Exhibit 130 for identification as</p> <p>17 of this date.)</p> <p>18</p> <p>19 Q. Ms. Stott, do you recognize this</p> <p>20 as an invoice sent from GSD&M to Sgt.</p> <p>21 Charvat?</p> <p>22 A. Yes.</p> <p>23 Q. Who does Sgt. Charvat work for?</p> <p>24 MS. CLEMONS: Objection to form.</p> <p>25 A. He is a contracting officer</p>	<p style="text-align: right;">Page 41</p> <p>1 L. STOTT</p> <p>2 see the media plan that this goes with in</p> <p>3 order to be able to give you a correct</p> <p>4 answer there or a complete answer.</p> <p>5 Q. Do you know whether amounts</p> <p>6 credited for audio programmatic are</p> <p>7 maintained separately from credits for</p> <p>8 display programmatic?</p> <p>9 MS. CLEMONS: Objection to form,</p> <p>10 foundation.</p> <p>11 A. I am not sure I understand what</p> <p>12 you mean. Can you rephrase that.</p> <p>13 Q. Let me ask a different question --</p> <p>14 strike that.</p> <p>15 Is Air Force seeking to recover</p> <p>16 damages for expenses paid to GSD&M for</p> <p>17 Google programmatic audio?</p> <p>18 MS. CLEMONS: Objection to form.</p> <p>19 A. Again, we have not been involved</p> <p>20 in the determination of what is being asked</p> <p>21 for, for damages or damages sought.</p> <p>22 Q. Does Air Force have an amount in</p> <p>23 mind that it believes would compensate Air</p> <p>24 Force for any harm suffered by Google</p> <p>25 relating to the allegations in this lawsuit?</p>

<p style="text-align: right;">Page 42</p> <p>1 L. STOTT</p> <p>2 MS. CLEMONS: Objection to form.</p> <p>3 Is this related to a topic that is</p> <p>4 one of the agreed upon topics for this</p> <p>5 deposition?</p> <p>6 MS. MILLIGAN: Topic 30.</p> <p>7 MS. CLEMONS: I believe the United</p> <p>8 States objected to that topic as</p> <p>9 calling for expert discovery and expert</p> <p>10 opinions, and the agreement was that</p> <p>11 these depositions were subject to</p> <p>12 counsel's objections.</p> <p>13 MS. MILLIGAN: Can we go off the</p> <p>14 record for a minute, please.</p> <p>15 THE VIDEOGRAPHER: The time is</p> <p>16 10:43 a.m. and we are off the record.</p> <p>17 (Whereupon, an off-the-record</p> <p>18 discussion was held.)</p> <p>19</p> <p>20 THE VIDEOGRAPHER: The time is</p> <p>21 11:17 a.m. This begins unit number 2,</p> <p>22 we are on the record.</p> <p>23 Q. Does Air Force have an amount of</p> <p>24 money in mind that it believes would</p> <p>25 compensate Air Force for any harm suffered</p>	<p style="text-align: right;">Page 44</p> <p>1 L. STOTT</p> <p>2 invoices from Google included?</p> <p>3 MS. CLEMONS: Objection to form.</p> <p>4 A. If there are Google charges in an</p> <p>5 invoice, they would be provided in the</p> <p>6 backup to the invoice, yes.</p> <p>7 Q. And does that backup include</p> <p>8 the -- so for instance, this invoice that we</p> <p>9 are looking at here, Exhibit 129, has</p> <p>10 purchases that reflects Google's purchases?</p> <p>11 A. Yes, it is not included in the</p> <p>12 exhibit that you gave me, but yes, there</p> <p>13 would be backup that would show those</p> <p>14 purchases.</p> <p>15 Q. And in that backup, are there</p> <p>16 invoices from Google?</p> <p>17 MS. CLEMONS: Objection to form.</p> <p>18 A. Since I don't have the backup in</p> <p>19 front of me, I can't verify that it is here.</p> <p>20 But yes, when GSD&M submits an invoice, they</p> <p>21 submit backup all of the charges that are in</p> <p>22 the invoice.</p> <p>23 Q. In that backup, do they include</p> <p>24 the invoices from vendors reflected on the</p> <p>25 invoice that GSD&M sends to you?</p>
<p style="text-align: right;">Page 43</p> <p>1 L. STOTT</p> <p>2 by Air Force from Google?</p> <p>3 MS. CLEMONS: Objection. I think</p> <p>4 this is outside of the scope of the</p> <p>5 agreed upon topics of this deposition.</p> <p>6 If you have personal knowledge, you</p> <p>7 could answer.</p> <p>8 A. I don't have any knowledge.</p> <p>9 Q. Could you pull out Exhibit 129.</p> <p>10 It is the first invoice we looked at.</p> <p>11 Does Air Force receive the</p> <p>12 underlying invoices from Google for the</p> <p>13 amounts reflected in this invoice?</p> <p>14 MS. CLEMONS: Objection to form.</p> <p>15 A. Do you mean in addition to this</p> <p>16 piece of paper do we get backup?</p> <p>17 Q. Well, that wasn't my question</p> <p>18 exactly, but does the Air Force get backup</p> <p>19 from Google for the amounts reflected in</p> <p>20 this invoice or Google purchases?</p> <p>21 MS. CLEMONS: Objection to form.</p> <p>22 A. Yes, the invoices always include</p> <p>23 the actual backup that goes with each one of</p> <p>24 the charges.</p> <p>25 Q. And in that backup are the</p>	<p style="text-align: right;">Page 45</p> <p>1 L. STOTT</p> <p>2 A. Yes, they would be required to</p> <p>3 provide backup for all charges that are in</p> <p>4 an invoice.</p> <p>5 Q. Does the Air Force review the</p> <p>6 amount that GSD&M pays to Google?</p> <p>7 MS. CLEMONS: Objection to form.</p> <p>8 A. The contracting officer</p> <p>9 representative is required to review the</p> <p>10 invoice in total, including all of the</p> <p>11 backup, and they review that against the</p> <p>12 approved media plan, the approved AIR and</p> <p>13 then whatever the monthly status report to</p> <p>14 MSR to ensure that the government has</p> <p>15 received what it has paid for.</p> <p>16 Q. So if I went and looked at the</p> <p>17 backup that you are describing, I would be</p> <p>18 able to determine whether or not GSD&M paid</p> <p>19 to Google the gross amount, the net amount</p> <p>20 or some other number for Google programmatic</p> <p>21 display?</p> <p>22 MS. CLEMONS: Objection to form.</p> <p>23 A. The backup would show where all of</p> <p>24 these numbers came from, yes.</p> <p>25 (Whereupon, a document Bates No.</p>

<p style="text-align: right;">Page 46</p> <p>1 L. STOTT</p> <p>2 USAF-ADS-0000013224 was marked Stotto</p> <p>3 Exhibit 131 for identification as of</p> <p>4 this date.)</p> <p>5 Q. Ms. Stott, I am handing you what</p> <p>6 has been marked as Exhibit 131 bearing Bates</p> <p>7 USAF-ADS-0000013224.</p> <p>8 Ms. Stott, what does AIR stand</p> <p>9 for?</p> <p>10 A. It is the advertising instruction</p> <p>11 record.</p> <p>12 Q. Do you recognize the document that</p> <p>13 I placed in front of you?</p> <p>14 A. Yes, this is an April 2022 version</p> <p>15 of our AIR procedures that we use within</p> <p>16 Recruiting Service Marketing.</p> <p>17 Q. And this says on the cover page,</p> <p>18 it says that this is version 2?</p> <p>19 A. It does. And it is from, again,</p> <p>20 April of 2022.</p> <p>21 Q. Do you know whether there are</p> <p>22 later versions of this document?</p> <p>23 A. Yes, this document gets updated</p> <p>24 probably two to three times a year.</p> <p>25 Q. So if I wanted to look for the AIR</p>	<p style="text-align: right;">Page 48</p> <p>1 L. STOTT</p> <p>2 Stott Exhibit 133 for identification as</p> <p>3 of this date.)</p> <p>4 Q. And my question is going to be</p> <p>5 about the email from Nora Rudyk, about</p> <p>6 two-thirds of the way down on page 848190</p> <p>7 that begins, ALCON, below is the official</p> <p>8 request for the upcoming FY '22, et cetera,</p> <p>9 et cetera?</p> <p>10 A. I am going to need a minute.</p> <p>11 Okay.</p> <p>12 Q. Ms. Stott, is the email from Norma</p> <p>13 Rudyk that I mentioned, which begins about</p> <p>14 two-thirds of the way down on page ending</p> <p>15 848190, an example of an AIR?</p> <p>16 A. Yes, it is.</p> <p>17 Q. If you turn to the following page</p> <p>18 with ends in 8191, you could see there is a</p> <p>19 section at the top, purpose description, it</p> <p>20 says, "This AIR is for the TFFY '22 Engage</p> <p>21 and Recruit ANG media plan attached. There</p> <p>22 are sufficient funds in this task order as</p> <p>23 identified in the proposal under TF Inspired</p> <p>24 media." In that sentence -- strike that.</p> <p>25 Is that sentence saying that the</p>
<p style="text-align: right;">Page 47</p> <p>1 L. STOTT</p> <p>2 instruction record procedures that were in</p> <p>3 place for 2019 and 2020 and the first part</p> <p>4 of 2021, where would I find those?</p> <p>5 A. If they are still in existence,</p> <p>6 they would be in the same shared drive as</p> <p>7 this version is. The contracting officer</p> <p>8 who oversees the AIR procedures, the current</p> <p>9 one, came in mid 2021, I think maybe late</p> <p>10 spring, early summer. So she has only been</p> <p>11 responsible for the ones since she came on</p> <p>12 board.</p> <p>13 Q. Do you have reason to believe that</p> <p>14 prior versions are no longer in existence?</p> <p>15 A. No, I have no reason to believe</p> <p>16 that.</p> <p>17 MS. MILLIGAN: Ms. Stott, I am</p> <p>18 marking for the record, Exhibit 133,</p> <p>19 bearing Bates USAF-ADS-000084-8189.</p> <p>20 And it has an attachment which we have</p> <p>21 labeled Exhibit 133 B. And that ends</p> <p>22 in Bates 848193. But I am just going</p> <p>23 to ask you about the A portion.</p> <p>24 (Whereupon, a document bearing</p> <p>25 Bates USAF-ADS-000084-8189 was marked</p>	<p style="text-align: right;">Page 49</p> <p>1 L. STOTT</p> <p>2 AIR is for the total force fiscal year 2022</p> <p>3 Engage and Recruit Air Force National Guard</p> <p>4 media plan?</p> <p>5 MS. CLEMONS: Objection to form.</p> <p>6 A. Yes, it is, it is referencing the</p> <p>7 attachment there.</p> <p>8 Q. And then below it says, "Breakdown</p> <p>9 per tactic is as follows," do you see that?</p> <p>10 A. I do.</p> <p>11 Q. And there is a line for Meta, a</p> <p>12 line for Indeed, a line for Google and a</p> <p>13 line for Ad Serving, do you see that?</p> <p>14 A. I do.</p> <p>15 Q. Which Google platforms are</p> <p>16 represented in the \$1,490,000 on the third</p> <p>17 line?</p> <p>18 MS. CLEMONS: Objection to form,</p> <p>19 foundation.</p> <p>20 A. I am going to need a minute to</p> <p>21 look through the media plan for that.</p> <p>22 So this should be referencing, it</p> <p>23 is slide 40 in the accompanying deck, but</p> <p>24 the number on the bottom ends in 848232.</p> <p>25 Are you there?</p>

<p style="text-align: right;">Page 50</p> <p>1 L. STOTT</p> <p>2 Q. Yes.</p> <p>3 A. So they are asking for partial</p> <p>4 approval of this media plan here that</p> <p>5 includes, I don't know the breakout between</p> <p>6 the DV360 and the Google search. But seeing</p> <p>7 as how she is explaining in the email that</p> <p>8 they didn't want search to go dark.</p> <p>9 It says at the bottom of the page</p> <p>10 ending in 848190, "Please note that current</p> <p>11 media plan under TO51 ends on 31 July, and</p> <p>12 in order to not go dark and continue the</p> <p>13 media, we will need approval on the current</p> <p>14 media plan no later than 28 July. There are</p> <p>15 sufficient funds in this task order as</p> <p>16 identified in the proposal under Total Force</p> <p>17 Engage and Recruit Media."</p> <p>18 So they are asking for funding not</p> <p>19 to go dark. And it would be between the</p> <p>20 DV360 and the Google paid search at the</p> <p>21 bottom.</p> <p>22 Q. And at the bottom, you are looking</p> <p>23 at page 848232?</p> <p>24 A. Yes.</p> <p>25 Q. So the total for those two line</p>	<p style="text-align: right;">Page 52</p> <p>1 L. STOTT</p> <p>2 see is when they need the approval by.</p> <p>3 Q. And the breakdown per tactic in</p> <p>4 the AIR for line item Google does not break</p> <p>5 the \$1,000,490 between Google platforms;</p> <p>6 correct?</p> <p>7 A. It doesn't in this AIR, no.</p> <p>8 Q. And it does not identify the</p> <p>9 breakdown per impression; correct?</p> <p>10 MS. CLEMONS: Objection to form.</p> <p>11 A. No, it does not.</p> <p>12 Q. And turning to the page where</p> <p>13 Ms. Rudyk's email begins?</p> <p>14 A. 8190?</p> <p>15 Q. 8190, thank you, above that email,</p> <p>16 Sgt. Steven China approves this AIR;</p> <p>17 correct?</p> <p>18 A. The way that the AIR process works</p> <p>19 is that the COR, which in this case is Sgt.</p> <p>20 China, recommends to approval to the primary</p> <p>21 COR, which at this point in time of Lt. Col.</p> <p>22 Hawkins. So he is sending that on to Lt.</p> <p>23 Col. Hawkins to recommend approval. And</p> <p>24 then Lt. Col. Hawkins reviews it again and</p> <p>25 makes the final approval and give it back to</p>
<p style="text-align: right;">Page 51</p> <p>1 L. STOTT</p> <p>2 items would be \$4,342,621; is that right?</p> <p>3 A. Correct.</p> <p>4 Q. And so it is the AIR requesting --</p> <p>5 strike that.</p> <p>6 Is the breakdown per tactic in the</p> <p>7 AIR for a specific time period?</p> <p>8 A. It doesn't say.</p> <p>9 Q. Do you know why the amounts don't</p> <p>10 match?</p> <p>11 MS. CLEMONS: Objection to form.</p> <p>12 A. This would be the total for the</p> <p>13 media plan and they are asking for partial</p> <p>14 funding at this point.</p> <p>15 Q. For an unspecified time period?</p> <p>16 A. I don't see the time period listed</p> <p>17 in the AIR. Let's see, additional comments</p> <p>18 requested for PCD to run through July 2023</p> <p>19 and outside the POP in order for media plan</p> <p>20 to support the recruiting needs, GSD&M is</p> <p>21 requesting approval no later than 28 July to</p> <p>22 allow time.</p> <p>23 I am just reading to see if there</p> <p>24 is any other reference to the dates.</p> <p>25 No, the only reference to date I</p>	<p style="text-align: right;">Page 53</p> <p>1 L. STOTT</p> <p>2 MSgt. China.</p> <p>3 Q. Lt. Col. Hawkins approval, is that</p> <p>4 at the top of page 8190?</p> <p>5 A. Yes, and kind of bleeds onto 8189</p> <p>6 also.</p> <p>7 Q. Okay, you could set that aside?</p> <p>8 A. Both documents?</p> <p>9 Q. Yes.</p> <p>10 MS. MILLIGAN: Marking as</p> <p>11 Exhibit 132 a documents bearing Bates</p> <p>12 USAF-ADS-0000771515.</p> <p>13 (Whereupon, a document bearing</p> <p>14 Bates USAF-ADS-0000771515 was marked</p> <p>15 Stott Exhibit 132 for identification as</p> <p>16 of this date.)</p> <p>17 Q. Ms. Stott, is this a task order</p> <p>18 created by the Air Force pursuant to the</p> <p>19 overarching contract between Air Force and</p> <p>20 GSD&M?</p> <p>21 A. Yes, it is.</p> <p>22 Q. And the task order number is on</p> <p>23 the front page here, under delivery order,</p> <p>24 FA300220F0009; is that right?</p> <p>25 A. That is the number, yes. We refer</p>

<p style="text-align: right;">Page 54</p> <p>1 L. STOTT</p> <p>2 to that though as task order 28.</p> <p>3 Q. Could you clarify?</p> <p>4 A. So that is the call number of the</p> <p>5 actual contract. But each individual task</p> <p>6 order has a number that started with 1 and</p> <p>7 continues to go up under the current</p> <p>8 contract. And on page ending in 00003 you</p> <p>9 will see at the top it says there FY20</p> <p>10 special warfare combat support advertising</p> <p>11 task order 0028.</p> <p>12 I am just telling you that is how</p> <p>13 we reference them.</p> <p>14 Q. You could set that aside.</p> <p>15 How did the Air Force become</p> <p>16 involved in this litigation?</p> <p>17 A. I would need to refer to my notes,</p> <p>18 one second.</p> <p>19 On December 23 of 2022, Michael</p> <p>20 Wolin with the Department of Justice</p> <p>21 e-mailed the Department of Defense Office of</p> <p>22 General Counsel, Sivram Prasad. And then</p> <p>23 Sivram Prasad then contacted the Air Force</p> <p>24 on December 23. And then internally that</p> <p>25 communication reached Mr. Barry Dickey at</p>	<p style="text-align: right;">Page 56</p> <p>1 L. STOTT</p> <p>2 Counsel for the Department of Defense?</p> <p>3 MS. CLEMONS: Objection to form.</p> <p>4 A. Yes, the Air Force was directed by</p> <p>5 the DOD Office of General Counsel.</p> <p>6 Q. Did Air Force conduct any</p> <p>7 investigation before -- strike that.</p> <p>8 Did Air Force conduct any</p> <p>9 investigation into the claims and</p> <p>10 allegations made in the complaint prior to</p> <p>11 deciding to participate in this lawsuit?</p> <p>12 MS. CLEMONS: Objection to form,</p> <p>13 foundation.</p> <p>14 A. Our involvement by Air Force, Big</p> <p>15 Air Force did not become involved until</p> <p>16 December 23 and Air Force Recruiting Service</p> <p>17 not until January 12 of 2023. That was the</p> <p>18 beginning of our involvement.</p> <p>19 Q. What did Air Force tell its ad</p> <p>20 agency, GSD&M, about this lawsuit?</p> <p>21 MS. CLEMONS: Objection to form,</p> <p>22 foundation.</p> <p>23 A. I did not have any conversations</p> <p>24 with Ms. Dickey or with Ms. Hatch about how</p> <p>25 GSD&M was notified or involved.</p>
<p style="text-align: right;">Page 55</p> <p>1 L. STOTT</p> <p>2 Air Force Recruiting Service on January 12</p> <p>3 of 2023.</p> <p>4 Q. Is Air Force involved in this</p> <p>5 litigation -- strike that.</p> <p>6 Prior to outreach by Michael</p> <p>7 Wolin, did Air Force have any plans to sue</p> <p>8 Google based on anything relating to the</p> <p>9 subject matter of the complaint?</p> <p>10 MS. CLEMONS: Objection to form.</p> <p>11 A. No, our first involvement or first</p> <p>12 notification there was on December 23, 2022.</p> <p>13 Q. Did Air Force have a choice to</p> <p>14 participate in this litigation?</p> <p>15 MS. CLEMONS: Objection to form.</p> <p>16 A. That was directed by the</p> <p>17 Department of Defense, Office of General</p> <p>18 Counsel.</p> <p>19 Q. Are you saying that the decision</p> <p>20 to participate in this litigation -- strike.</p> <p>21 Are you saying that Air Force's</p> <p>22 decision -- strike that.</p> <p>23 Are you saying that Air Force's</p> <p>24 participation in this litigation is due to a</p> <p>25 decision made by the Office of General</p>	<p style="text-align: right;">Page 57</p> <p>1 L. STOTT</p> <p>2 I can't really say if DOD reached</p> <p>3 out to them directly or if that notification</p> <p>4 came from Air Force Recruiting Service, but</p> <p>5 I don't know.</p> <p>6 Q. What facts are Air Force aware of</p> <p>7 regarding Google's alleged monopolization?</p> <p>8 MS. CLEMONS: Object to the extent</p> <p>9 that calls for privileged</p> <p>10 communications with counsel. If you</p> <p>11 could answer without referring to</p> <p>12 privileged communications with counsel,</p> <p>13 you may do so.</p> <p>14 A. That would all have been</p> <p>15 conversations with counsel.</p> <p>16 Q. Ms. Stott, what did you do to</p> <p>17 prepare for today's deposition?</p> <p>18 A. I had probably eight to ten</p> <p>19 meetings with counsel. I reviewed multiple</p> <p>20 documents and spent a total of about 60</p> <p>21 hours either reviewing documents or having</p> <p>22 conversations with people internal at</p> <p>23 Recruitment Service Marketing including</p> <p>24 Ms. Hatch, Mr. Dickey, Maj. Lane. I also</p> <p>25 spoke with Maj. Brian Murray and Ms. Larisa</p>

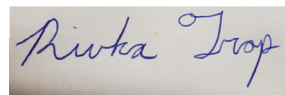
15 (Pages 54 - 57)

<p style="text-align: right;">Page 58</p> <p>1 L. STOTT</p> <p>2 Wright in that preparation.</p> <p>3 Q. Did you have any conversations</p> <p>4 with anyone at GSD&M in preparation for this</p> <p>5 deposition?</p> <p>6 A. No, I did not.</p> <p>7 MS. MILLIGAN: I am just going to</p> <p>8 mark your notes. So I am marking</p> <p>9 Ms. Stott's notes as Exhibit 134.</p> <p>10 (Whereupon, notes was marked Stott</p> <p>11 Exhibit 134 for identification as of</p> <p>12 this date.)</p> <p>13 MS. MILLIGAN: Off the record for</p> <p>14 one minute.</p> <p>15 THE VIDEOGRAPHER: The time is</p> <p>16 11:45 a.m., we are off the record.</p> <p>17 (Whereupon, an off-the-record</p> <p>18 discussion was held.)</p> <p>19 THE VIDEOGRAPHER: The time is</p> <p>20 11:46 a.m., we are on the record.</p> <p>21 MS. MILLIGAN: I have no further</p> <p>22 questions, Ms. Stott. I want to thank</p> <p>23 you and the Air Force for your time</p> <p>24 today.</p> <p>25 MS. CLEMONS: We will just take a</p>	<p style="text-align: right;">Page 60</p> <p>1 L. STOTT</p> <p>2 that GSD&M has sent to Air Force since 2019?</p> <p>3 A. No, I did not.</p> <p>4 Q. So are you aware of whether that</p> <p>5 exact process was followed, as you described</p> <p>6 it, in 100 percent of the invoices that were</p> <p>7 sent from GSD&M to Air Force?</p> <p>8 MS. MILLIGAN: Objection to form.</p> <p>9 A. No, I can't confirm that for every</p> <p>10 single invoice. I can only speak to what</p> <p>11 the process is supposed to be. In fact, our</p> <p>12 current contracting officer, Ms. Hatch, only</p> <p>13 came on, as I stated, I think it was late</p> <p>14 spring, early summer of 2021. And she would</p> <p>15 not be able to confirm that either.</p> <p>16 MS. CLEMONS: That's all the</p> <p>17 questions that we have.</p> <p>18 MS. MILLIGAN: Nothing further.</p> <p>19 THE VIDEOGRAPHER: The time is</p> <p>20 12:06 p.m. We are off the record.</p> <p>21 (Whereupon, an off-the-record</p> <p>22 discussion was held.)</p> <p>23 THE VIDEOGRAPHER: The time is</p> <p>24 12:07 p.m. we are on the record.</p> <p>25 MS. MILLIGAN: What is the total</p>
<p style="text-align: right;">Page 59</p> <p>1 L. STOTT</p> <p>2 quick break.</p> <p>3 THE VIDEOGRAPHER: The time is</p> <p>4 11:46 a.m. We are off the record.</p> <p>5 (Whereupon, a short recess was</p> <p>6 taken.)</p> <p>7 THE VIDEOGRAPHER: The time is</p> <p>8 12:04 p.m. We are on the record.</p> <p>9 EXAMINATION BY</p> <p>10 MS. CLEMMONS:</p> <p>11 Q. Earlier you testified about backup</p> <p>12 information provided with invoices. Do you</p> <p>13 recall that testimony?</p> <p>14 A. I do, yes.</p> <p>15 Q. When you were describing the kinds</p> <p>16 of information that are attached to</p> <p>17 invoices, were you describing the difficult</p> <p>18 process or every invoice involved?</p> <p>19 A. I was describing the process that</p> <p>20 we typically follow within recruiting</p> <p>21 service marketing. And that process was</p> <p>22 confirmed when I reviewed, I would estimate</p> <p>23 somewhere between 10 and 15 various invoices</p> <p>24 from throughout the period in question.</p> <p>25 Q. But did you review every invoice</p>	<p style="text-align: right;">Page 61</p> <p>1 L. STOTT</p> <p>2 time on the record?</p> <p>3 THE VIDEOGRAPHER: One hour and 30</p> <p>4 minutes.</p> <p>5 MS. MILLIGAN: And three minutes</p> <p>6 of those counted for plaintiff?</p> <p>7 MS. CLEMONS: Yes, the United</p> <p>8 States agrees that those three minutes</p> <p>9 will not count towards defendant's 14</p> <p>10 hours of 30(b)(6) time.</p> <p>11 THE VIDEOGRAPHER: The time is</p> <p>12 12:07 p.m. We are off the record.</p> <p>13 (Whereupon, at 12:07 P.M., the</p> <p>14 Examination of this witness was</p> <p>15 concluded.)</p> <p>16</p> <p>17 o o o o</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

Page 62

1 L. STOTT
2 D E C L A R A T I O N
3
4 I hereby certify that having been first
5 duly sworn to testify to the truth, I gave
6 the above testimony.
7
8 I FURTHER CERTIFY that the foregoing
9 transcript is a true and correct transcript
10 of the testimony given by me at the time and
11 place specified hereinbefore.
12
13
14
15 _____
16 LARA STOTT
17
18 Subscribed and sworn to before me
19 this ____ day of _____ 20 ____.
20
21
22 _____
23 NOTARY PUBLIC
24
25

Page 64

1 L. STOTT
2 C E R T I F I C A T E
3
4 STATE OF NEW YORK)
5 : SS.:
6 COUNTY OF QUEENS)
7
8 I, RIVKA TROP, a Notary Public for and
9 within the State of New York, do hereby
10 certify:
11 That the witness whose examination is
12 hereinbefore set forth was duly sworn and
13 that such examination is a true record of
14 the testimony given by that witness.
15 I further certify that I am not related
16 to any of the parties to this action by
17 blood or by marriage and that I am in no way
18 interested in the outcome of this matter.
19 IN WITNESS WHEREOF, I have hereunto set
20 my hand this 20th day of September, 2023.
21
22 
23 RIVKA TROP
24
25

Page 63

1 L. STOTT
2
3 I N D E X
4
5 EXAMINATION BY PAGE
6 MS. MILLIGAN 4
7 MS. CLEMONS 59
8
9 E X H I B I T S
10
11 STOTT EXHIBITS
12 EXHIBIT EXHIBIT
13 LETTER DESCRIPTION PAGE
14
15 126 Document bearing Bates 6
16 USAF-ADS-000041-6385
17 127 Document bearing Bates 7
18 USAF-ADS-000077-1834
19
20 128 Document bearing Bates 12
21 USAF-ADS-000061-8109
22 129 Document bearing Bates 29
23 USAF-ADS-000077-1565
24
25 130 Document bearing Bates 39
26 USAF-ADS-000077-1759
27 131 Document Bates No. 46
28 USAF-ADS-0000013224
29
30 133 Document bearing Bates 47
31 USAF-ADS-000084-8189
32 132 Document bearing Bates 53
33 USAF-ADS-000077-1515
34
35 134 Notes 58
36 (Exhibits retained by counsel.)